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**CLIMATE BRIDGE**

**环保桥**

**ANTI-CORRUPTION AND BRIBERY POLICY**

**反贪污贿赂政策**

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## Schedule 清单

SCHEDULE POTENTIAL RISK SCENARIOS: "RED FLAGS" 潜在的风险：“亮红灯”的情况  
ERROR! BOOKMARK NOT DEFINED.

### 1.POLICY STATEMENT

#### 一. 政策简介

1.1 This policy applies to the Climate Bridge Ltd. BVI and its subsidiaries (the “Group”).

一（1）此政策适用于 CLIMATE BRIDGE BVI公司及其子公司（以下表示为“集团”）

1.2 It is our policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate, and implementing and enforcing effective systems to counter bribery.

一（2）我们会在公司日常经营活动中贯彻诚实守信，合乎道德标准的行为方式。本公司拒绝任何参与贪污贿赂的行为，并且在本公司任何运营所在地，在本公司参与的所有商业交易和商业关系中，都会致力于保持公平的，正直的，符合我们职业操守的行为准则，并贯彻执行一系列有效的反贿赂系统。

1.3 We will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate.

一（3）我们会在本集团运作经营的所有国家地区遵守反贪污反贿赂的法律。

1.4 The purpose of this policy is to:

- (a) set out our responsibilities, and of those working for us, in observing and upholding our position on bribery and corruption; and
- (b) provide information and guidance to those working for us on how to recognise and deal with bribery and corruption issues.

一（4）此政策的目的是：

- A. 阐明本公司及所有为本公司工作的人的责任，以遵守及维持我们在反贿赂腐败中的立场
- B. 给所有为本公司工作的人提供信息和指导，怎样去正确分辨及处理贿赂腐败的有关问题。

1.5 Bribery and corruption are punishable for individuals by up to ten years' imprisonment and if we are found to have taken part in corruption we could face an unlimited fine, be excluded

from tendering for public contracts and face damage to our reputation. We take our legal responsibilities very seriously.

一（5）任何参与贿赂腐败行为的个人最高可被判十年有期徒刑，一旦公司被发现有参与贪污则本公司会面临无上限罚款，被禁止参与公共合同谈判，以及巨大的名誉损失。我们非常认真严肃的看待我们的法律责任。

1.6 We have identified that the following are particular risks for our business:

一（6）我们明确地指出以下几个于本公司生意有关的特殊风险：

- (a) There can at times be strong pressure on companies doing business in China to provide facilitation payments to public officials;

在中国从事生意的公司有时会在给予公务员“加速费”（好处费）的问题中面临巨大的压力

- (b) Agents or brokers working on behalf of the Group on sourcing projects in China may potentially provide facilitation payments to public officials or bribe Third Parties without the knowledge of the Group;

代表集团的中介机构或者经纪人在中国寻找项目时可能会在集团本身并不知情的情况下给予公务员“加速费”或对第三方进行行贿。

- (c) It is possible that our counterparties may, unbeknownst to the Group, engage in bribery;

本公司的交易对方有可能在集团身并不知情的情况下，从事贿赂活动。

- (d) We may expand into new and less familiar jurisdictions;

我们可能会到一个新的不熟悉司法辖区下开展新业务

- (e) We have direct interactions with public sector entities, including the United Nations Framework Convention on Climate Change (UNFCCC), State Owned Enterprises and the National Development and Reform Commission (NDRC) in China.

本公司与公共部门有直接的联系，包括联合国气候变化框架公约组织和中国国家发展和改革委员会

To address those risks we have:

为了正确处理这些风险，我们已经：

- (f) Ensured that only senior employees in China can enter into contracts, agreements, or make payments with counterparties on our behalf;

确保仅有中国高级雇员可以代表本公司与交易对方签订合同，协议以及支付款项

- (g) Ensured that due diligence is to be undertaken of our counterparties in line with our Risk Assessment and Due Diligence Policy, and ensure that they understand the Group's anti-bribery policy and agree to act within the bounds of it;

根据本公司的风险评估和审慎调查政策，确保对本公司的交易对方进行仔细审查，并且确保他们完全理解本集团的反贪污政策以及同意在此政策规定范围内从事商业活动。

- (h) Implemented a policy to ensure that any entity that we do business with is fully aware of our strong commitment to anti-bribery and not engaging in any form of corruption, and that they act accordingly;

采取一项政策以确保任何与本公司有生意往来的公司或者个人能够充分意识到本公司对于反贪污和不参与任何腐败贿赂活动的坚定承诺，并且他们也会做到

- (i) Implemented a strict policy such that all payments to or from Third Parties from or to the Group are strictly monitored;

采取一项严厉的措施来严格监督所有从集团付予第三方的款项

- (j) Directed that all new agreements with suppliers, agents or brokers, customers, partners and shareholders contain contractual provisions requiring such entities not to engage in bribery or corrupt practices;

在所有与供货方，中介，经纪人，各户，合伙人和股东们签订的新合同中，要求该公司或者个人（经济实体）不得参与贪污贿赂活动

- (k) Provided clear guidance from top level management that bribery, corrupt practices or unethical behaviour will not be tolerated within the Group;

从公司最高级管理层开始，提供具体清晰的所有不被集团允许的贿赂，腐败或者不道德的行为准则。

- (l) Ensured that anti-bribery and anti corruption issues are discussed, monitored and addressed on a regular basis at the highest levels within the Group, and that there is ongoing top-level commitment within the Group to this policy.

确保在公司最高阶层中，定期讨论，监督和处理反贪污和反贿赂腐败的事件和问题，并且确保该活动得以长期进行下去

- (m) Ensured the preparation, communication, implementation and regular monitoring of this policy and the provision of related training to all staff.

确保该政策的起草准备，沟通交流，制定采用和定期监督，并且为所有员工提供相关培训

- (n) Implemented a policy to ensure reporting of all gifts or hospitality given or received (above agreed acceptable levels).

采取一项政策以确保所有超过公司规定范围内所给予或接受的礼品和招待必须进行汇报

- (o) Appointed (i) a Compliance Officer and (ii) a Compliance Manager in each office, to ensure compliance with this policy.

委任一位条例执行经理来保证此政策的执行和服从。

1.7 In this policy, **third party** means any individual or organisation you come into contact with during the course of your work for us, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

在此政策中，第三方意为在你为本公司工作中，参与到合同中的任何个人或机构，包括实际或潜在的各户，消费者，供货方，经销商，生意联系人，中介，顾问，以及政府机关（包括他们的顾问，代表和官员，政客及政党代表）

## 2. WHO IS COVERED BY THE POLICY?

此政策适用范围

This policy applies to all individuals working at all levels and grades, including senior managers, officers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, homeworkers, casual workers and agency staff, volunteers, interns, agents, sponsors, or any other person associated with us, or any of our subsidiaries or their employees, wherever located (collectively referred to as **workers** in this policy).

此政策适用于所有等级的个人，包括高级管理人员，高级官员，董事，雇员（无论是永久，定期还是临时员工），顾问，承包者，培训生，附属人员，家庭雇工，兼职员工和代理机构员工，义工，实习生，中介，赞助商，或者其他任何与本公司及子公司（无论该公司处于何地）有关联的个人。（在此政策中统称为“员工”）

## 3. WHAT IS BRIBERY? 什么是贿赂

A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

贿赂是出于获得任何商业上，合同中，法律法规和个人利益的目的而提出，承诺或给予的诱惑或报酬。

**Examples: 举例**

**Offering a bribe 行贿**

You offer a potential client tickets to a major sporting event, but only if they agree to do business with us.

你提供给一位潜在客户一项体育赛事的门票，但前提是他们同意与本公司进行商业

交易。

This would be an offence as you are making the offer to gain a commercial and contractual advantage. We may also be found to have committed an offence because the offer has been made to obtain business for us. It may also be an offence for the potential client to accept your offer.

该举动是违法行为，因为你为了商业和合同上的利益给予了相应报酬。本公司也可能被认定从事违法行为因为该报酬是为了公司获得生意而被提供。你的潜在客户如果接受了你的报酬也可能被认定为违法。

### **Receiving a bribe 受贿**

A supplier gives your nephew a job, but makes it clear that in return they expect you to use your influence in our organisation to ensure we continue to do business with them.

一位供货商给你的侄子提供了一份工作，但前提是你必须利用你在公司的影响力来保证本公司继续和他们进行生意往来。

It is an offence for a supplier to make such an offer. It would be an offence for you to accept the offer as you would be doing so to gain a personal advantage.

供货商的行为是违法行为。如果你接受了他的好处，则也会导致违法罪名成立因为你这样做是获取了个人利益。

### **Bribing an official 对公务员行贿**

You arrange for the business to pay an additional payment to an official to speed up an administrative process.

你安排公司付与一位公务员额外的钱，让他加快处理行政手续。

The offence of bribing a public official has been committed as soon as the offer is made. This is because it is made to gain a business advantage for us. We may also be found to have committed an offence.

一旦你提供了这份好处，则对公务员行贿的罪名就会成立。这是因为我们公司从中得到了商业利益。我们公司也会被认定为违法。

## **4. GIFTS AND HOSPITALITY 礼品和招待**

4.1 This policy does not prohibit normal and appropriate hospitality (given and received) to or from third parties. Gifts of value over £50 may not be offered to any third parties without approval from a senior manager.

此政策不禁止从或者向第三方（接受或提供）正常和适当的招待。在没有得到高层经理允许的情况下，不得提供价值在 5 0 英镑以上的礼品。

4.2 The giving or receipt of gifts is not prohibited, if the following requirements are met:

如果遵守了以下条款，则给予或接受礼品是被允许的：

- (a) it is not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits;

该行为不得附带以下任何意图：该礼品是用来影响第三方来获得或者维持商业利益，或作为奖赏提供或者维持商业利益，或作为其他任何明的或者暗的好处的报酬。

- (b) it complies with local law;

该行为符合当地的法律

- (c) it is given in our name, not in your name;

该礼品是以公司名义，而不是个人名义进行

- (d) it is appropriate in the circumstances. For example, in various jurisdictions it is customary for small gifts to be given at Christmas and new year;

该礼品在某些时间场合是适当的。比如：在英国或澳大利亚，在圣诞节期间赠送小礼物是当地习惯

- (e) taking into account the reason for the gift, it is of an appropriate type and value and given at an appropriate time;

考虑接受 / 赠送该礼品的原因，是否是合适的时间，合适的种类和价格

- (f) it is given openly, not secretly; and

该礼品是公开赠与的，不是保密的

- (g) gifts should not be offered to, or accepted from, government officials or representatives, or politicians or political parties, without the prior approval of the compliance manager.

在没有得到条例执行经理允许的情况下，不得向 / 从政府官员或代表，政党官员代表提供或接受任何礼物。

4.3 We appreciate that the practice of giving business gifts varies between countries and regions and what may be normal and acceptable in one region may not be in another. The test to be applied is whether in all the circumstances the gift or hospitality is reasonable and justifiable. The intention behind the gift should always be considered.

我们理解每个国家地区送礼的习俗不同，有些可以被接受，而有些不行。评估标准为：在任何情形下，该礼品和招待是否是合理并且正当的。礼品背后包含的意图必须要一直被考虑进来。

## 5. WHAT IS NOT ACCEPTABLE? 违规行为？

It is not acceptable for you (or someone on your behalf) to:

以下你（或者你的代表）的行为是违反政策规定的：

- (a) give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;

给予，承诺给予，或者提供款项，礼品或招待，并借此希望得到商业利益，或作为已经得到的商业利益的报酬补偿

- (b) give, promise to give, or offer, a payment, gift or hospitality to a government official, agent or representative to "facilitate" or expedite a routine procedure;

给予，承诺给予，或者提供款项，礼品或招待，给一位政府官员，中介或代表，以加快一些常规步骤程序

- (c) accept payment from a third party that you know or suspect is offered with the expectation that it will obtain a business advantage for them;

知道或者怀疑某第三方所提供的款项是带有获取商业利益的预期，仍然接受了该款项

- (d) accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by us in return;

知道或者怀疑某第三方所提供的款项是带有从本公司获取商业利益作为回报的预期，仍然接受了该款项

- (e) threaten or retaliate against another worker who has refused to commit a bribery offence or who has raised concerns under this policy; or

威胁或报复其他拒绝贿赂行为或意识到此政策下贿赂问题的员工

- (f) engage in any activity that might lead to a breach of this policy.

参与任何会导致违反此政策的行为

## 6. FACILITATION PAYMENTS AND KICKBACKS 好处费和回扣

6.1 We do not make, and will not accept, facilitation payments or "kickbacks" of any kind. Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official. They are not commonly paid in the UK, but are common in some other jurisdictions in which we operate such as China.

本公司不提供，且不会接受任何形式的好处费或回扣。好处费是小额的，非正式的款项，一般提供给政府官员用来保证或者加快常规的日常工作。在英国不常见，但在中国和其他本公司运营的司法辖区及其常见。

- 6.2 If you are asked to make a payment on our behalf, you should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided. You should always ask for a receipt which details the reason for the payment. If you have any suspicions, concerns or queries regarding a payment, you should raise these with the compliance manager.

如果你被要求代表本公司支付一笔款项，你应该永远记住这笔款项的用途和金额（该金额是否与本公司提供的货物和服务成一定比例）。你应该要求一份含有详尽付款理由的收据。如果你有任何对此款项的怀疑，担忧或者疑问，你应该向条例执行经理提出。

- 6.3 Kickbacks are typically payments made in return for a business favour or advantage. All workers must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by us.

回扣（佣金）是典型的回报所得到的利益而给予他方的付款。所有员工必须避免任何可能导致，或暗示，本公司会有一些好处费或回扣可以给予的行为。

## 7. DONATIONS

### 捐款

We generally do not make contributions to political parties, and such contributions are never made in an attempt to influence any decision or gain a business advantage and are always publically disclosed. We may make charitable donations that are legal and ethical under local laws and practices. No donation must be offered or made without the prior approval of the compliance manager.

本公司通常不进行政治捐款，若有捐款，也绝对公开透明，绝非出于收买或是谋利目的。本公司可能在遵照当地法律和惯例的情况下进行慈善捐赠。任何捐赠都必须通过条例执行经理的事先批准。

## 8. YOUR RESPONSIBILITIES

### 个人责任

- 8.1 You must ensure that you read, understand and comply with this policy.

请务必阅读、理解和遵守此规定。

- 8.2 The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for us or under our control. All workers are required to avoid any activity that might lead to, or suggest, a breach of this policy.

防范、查明和报告贪污贿赂行为是所有员工共同的责任。任何人都必须避免有可能导致或是诱发违法的行为。

- 8.3 You must notify the compliance manager as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future. For example, if a client or potential client offers you something to gain a business advantage with us, or indicates to you that a gift or payment is required to secure their business. Further "red flags" that may indicate bribery or corruption are set out in the Schedule.

员工有义务将任何已经或是未来可能发生的腐败、疑似腐败行为尽早通报条例执行经理。例如，受到一位客户或是潜在客户出于谋取利益的目的馈赠，或是要求行贿的暗示。其他“红旗”情形详见“明细单”。

- 8.4 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. We reserve our right to terminate our contractual relationship with other workers if they breach this policy.

任何违反该政策的员工都将受到惩处，情节严重的可能被辞退。对于违反该条例的员工本公司拥有解雇权。

## 9. RECORD-KEEPING

### 记录

- 9.1 We must keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties.

本公司将做好财务信息记录，落实内部管理，对所有给予第三方的款项做出解释说明。

- 9.2 All Climate Bridge staff must declare and keep a written record of all hospitality or gifts of value over £50 accepted or offered, which will be subject to managerial review.

所有环保桥员工必须上报、记录已接受或被提供的招待和价值超过 50 英镑的礼品，该记录将受到公司管理层的审查。

- 9.3 You must ensure all expenses claims relating to hospitality, gifts or expenses incurred to third parties are approved by the Compliance Manager and are submitted in accordance with our expenses policy and specifically record the reason for the expenditure.

你必须确保所有用于接待、礼品和由第三方引起的支出得到条例执行经理的批准，符合公司的相关政策规定，并对支出理由做出详尽记录。

- 9.4 All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness. No accounts must be kept "off-book" to facilitate or conceal improper payments.

所有与第三方（如客户、供应商和商务联系人）有关的账目、收据、备忘录及其他文件和记录在保证准确无误并完整无遗后必须妥善保存。严禁隐藏任何会计账目用于违规操作。

## **10. HOW TO RAISE A CONCERN**

### **如何举报**

You are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If you are unsure whether a particular act constitutes bribery or corruption, or if you have any other queries, these should be raised with the Compliance Manager. Concerns should be reported by following the procedure set out in our Whistleblowing Policy. A copy of our Whistleblowing Policy can be obtained from the Compliance Manager, and is also available on the intranet.

对任何违规行为或是疑似违规行为都应该尽早进行举报。如果你对某一行为是否构成贪污腐败，或者你有其他疑问，请向条例执行经理报告。举报程序请参照公司的《举报政策》。你可以从条例执行经理处获取纸质版文件，或是在公司内部网站下载电子版。

## **11. WHAT TO DO IF YOU ARE A VICTIM OF BRIBERY OR CORRUPTION**

### **贪污腐败受害人应采取措施**

It is important that you tell the compliance manager as soon as possible if you are offered a bribe by a third party, are asked to make one, suspect that this may happen in the future, or believe that you are a victim of another form of unlawful activity.

如果你已经被第三方行贿，或被要求行贿，或怀疑即将会受到第三方行贿、或被要求行贿，或是怀疑自己已成为其他违法行为的受害者，你务必将情况尽早通知条例执行经理，这一点至关重要。

## **12. PROTECTION**

### **保护**

- 12.1 Workers who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. We absolutely encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

拒绝行、受贿的员工，以及举报他人违规行为的员工，有可能担心会招致对自身不利的后果。我们追求公正透明，并会对任何出于善意而做出提醒的员工进行保护，即便他们的举报可能有误。

- 12.2 We are committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place, or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the compliance manager immediately.

本公司承诺保护员工，保证他们不因拒绝行、受贿或是举报任何实际或潜在的，正在发生或以后可能发生的贪污腐败行为而受到任何伤害。该伤害包括：解雇、惩处、威胁或是其他形式的不公正待遇。如果你认为受到不公正待遇，应该立即通报条例执行经理。

### 13. TRAINING AND COMMUNICATION

#### 培训和沟通

- 13.1 Training on this policy forms part of the induction process for all new workers. All existing workers will receive regular, relevant training on how to implement and adhere to this policy.

所有新员工在入职时都会接受这一政策的相关培训。所有现有员工会接受定期的相关培训，从而了解如何执行和遵守这项政策。

- 13.2 Our zero-tolerance approach to bribery and corruption must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter.

必须在商务合作初始告知供应商、承包商和其他合作伙伴本公司对行贿的零容忍态度。

### 14. WHO IS RESPONSIBLE FOR THE POLICY?

#### 谁对该政策负责？

- 14.1 The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

董事会总体负责确保这一政策与公司的法律、道德义务相一致，并确保员工对该政策的遵从。

- 14.2 The Compliance Manager has primary and day-to-day responsibility for implementing this policy, and for monitoring its use and effectiveness. Management at all levels are responsible

for ensuring those reporting to them are made aware of and understand this policy and are given adequate and regular training on it.

条例执行经理负责该政策的主要的日常执行，以及对其效力的监管。所有公司经理必须确保下属员工完全理解这一政策，并经常得到相关培训。

## 15. MONITORING AND REVIEW

### 监管和修订

- 15.1 The Compliance Manager will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible. Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in countering bribery and corruption.

条例执行经理将监管该政策的效力、执行情况，时常检查其适用性、完备性和有效性。任何必要修订都会迅速得到执行。内部管理系统和流程会受到定期审查，从而保证它们在反贪污腐败方面行之有效。

- 15.2 All workers are responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrongdoing.

所有员工都有责任保证这一政策的成功施行，并在必要时进行使用。

- 15.3 Workers are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the compliance manager.

欢迎公司员工对这一政策提出意见和建议。意见、建议和咨询应向条例执行经理提交。

- 15.4 This policy does not form part of any employee's contract of employment and it may be amended at any time.

这一政策不是员工劳动合同的构成部分，政策内容随时可能修订。

## **Schedule      Potential risk scenarios: "red flags"**

### **清单：潜在的风险：“亮红灯”的情况**

The following is a list of possible red flags that may arise during the course of you working for us and which may raise concerns under various anti-bribery and anti-corruption laws. The list is not intended to be exhaustive and is for illustrative purposes only.

以下是一份清单，列出了在你为本公司工作中可能出现的“亮红灯”的情况，这些情况都有可能引起在反贿赂和反腐败法下值得深思的一些问题。该清单并非包括所有可能出现情景，仅作为示例供参考：

If you encounter any of these red flags while working for us, you must report them promptly to the compliance manager:

当你在为本公司工作时碰到以下任何亮红灯的情况，你必须即可向条例执行经理汇报：

- (a) you become aware that a third party engages in, or has been accused of engaging in, improper business practices;

你察觉到某第三方参与，或曾被指控参与，不正当商业行为

- (b) you learn that a third party has a reputation for paying bribes, or requiring that bribes are paid to them, or has a reputation for having a "special relationship" with government officials;

你了解到某第三方曾有过行贿或受贿，或拥有与政府官员有“特殊关系”这样的名声；

- (c) a third party insists on receiving a commission or fee payment personally before committing to sign up to a contract with us,
- (d) a third party insists on receiving a commission or fee payment personally before committing to carry out a government function or process for us;

某第三方在承诺与我们签订合约或履行政府职能或职责前，坚持索要佣金或者费用；

- (e) a third party requests payment in cash and/or refuses to sign a formal commission or fee agreement, or to provide an invoice or receipt for a payment made;

某第三方要求现金付款；拒绝签署正式委托或收费协议；或拒绝提供已付款的收据或发票

- (f) a third party requests that payment is made to a country or geographic location different from where the third party resides or conducts business;

某第三方要求付款至其常驻地或注册地之外的国家（地区）

- (g) a third party requests an unexpected additional fee or commission to "facilitate" a service;

某第三方要求额外的费用或佣金来加快其应提供的服务

- (h) a third party demands lavish entertainment or gifts before commencing or continuing contractual negotiations or provision of services;

某第三方在开始或继续合约谈判或提供服务之前，索要奢侈的娱乐享受或礼品

- (i) a third party requests that a payment is made to "overlook" potential legal violations;

某第三方索要一笔付款，则会对某些潜在的违法行为视而不见。

- (j) a third party requests that you provide employment or some other advantage to a friend or relative;

某第三方要求你提供给你的亲戚朋友就业机会或其他好处

- (k) you receive an invoice from a third party that appears to be non-standard or customised;

你从某第三方处收到的不符合统一规范的发票或改过的发票

- (l) a third party insists on the use of side letters or refuses to put terms agreed in writing;

某第三方坚持使用附函（附在信件里的信）或拒绝采用书面形式记录协议条款

- (m) you notice that we have been invoiced for a commission or fee payment that appears large given the service stated to have been provided;

你发觉本公司被要求开超出了规定服务内佣金额费用的发票

- (n) a third party requests or requires the use of an agent, intermediary, consultant, distributor or supplier that does not appear to be providing a legitimate service or whose role in the transaction is unclear; or

某第三方要求或需要雇佣本公司不经常用或不曾知道的中介，中间人，顾问，经销商或供货商

- (o) you are offered an unusually generous gift or offered lavish hospitality by a third party.

第三方提供了你一份罕见的厚礼或奢侈的款待